

**Young, Ryan**

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**From:** Kristin M. Drieman <KDrieman@merchantgould.com>  
**Sent:** Thursday, January 16, 2020 11:02 AM  
**To:** Pham, Christopher; Fleming, Terrence; Janus, Leah; Hanson, Katheryn; Haberman, Brenda; Hokans, Christian  
**Cc:** Allen Hinderaker; Heather Kliebenstein; Joe Dubis, Ph.D.; Michael Erbele; Carol A. Nystrom; Abigail E. Krueger; Anne-Marie Larkin  
**Subject:** FICO v. Federal\_Expert Disclosure  
**Attachments:** Sacco\_CV.pdf; Sacco\_Executed Written Assurance.pdf

[EXTERNAL E-MAIL]

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Counsel,

Pursuant to the Court's Protective Order, FICO gives notice that it intends to provide Confidential or Confidential – AEO documents in connection with this matter to Brian Sacco. Please find attached Mr. Sacco's executed Written Assurance and CV. Mr. Sacco has no prior testimony.

Thank you,

**Kristin M. Drieman**

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**EXHIBIT 2**



**Resource name:** Brian Sacco

**Resource type:** Decision Management Architect

### **Summary**

An experienced Decision Management Architect and Software Developer, Mr. Sacco has over 20 years of experience analyzing and applying information technologies to solve business challenges. His experience spans the public and private sectors, contributing to FICO-based solutions for McKesson Corporation, The Internal Revenue Service, Eaton Corporation and Federated Investors. Mr. Sacco has applied strong technical and analytical skills to capture and analyze requirements, develop and architect solutions across various industries including Financial, Healthcare, Manufacturing, Insurance, Energy and Logistics.

Mr. Sacco is capable in various roles including Architect, Developer and Analyst.

### **Roles and accomplishments**

#### *Rules Architect and Developer – Internal Revenue Service*

Lead technical resource responsible for delivering FICO Blaze Advisor business rules design, development and deployment in support of several mission critical systems. Provide strategic recommendations on design and development options based on emerging trends and opportunities. Guide business rules implementation tasks of subcontractors and IRS business personnel, validating governance and best practices, and ensuring the solution is maintainable, scalable and performing.

Gathers, documents and analyzes system and functional requirements from system stakeholders and project leadership, and coordinates review sessions ensuring requirements are accurately captured. Translates requirements to system designs and alternatives for implementation. Develops comprehensive documentation of requirements, considerations, decisions and designs.

Extend a business rules framework that fosters consistency and business usability across the repository implementation. Enhance and extend business rules testing and simulation capabilities. Perform regular training and education for business users on the business rules governance, best practices, concepts and technology capabilities.

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#### *Systems Analyst and Development – Insurance Claims Adjudication*

Support data migration initiative to modernize and enhance the capabilities of several data sources. Provide strategic development support of specific modernization tasks, including graphical user interface, backend web service integrations and foundational reusable capabilities that facilitate solution capabilities.

Led upgrade to Blaze Advisor 7.5, and contributed to strategic planning for future functionality migration to the rules engine platform. Provide strategic guidance and assistance to the project team in several areas including technology, prioritization and planning, requirements analysis and test planning.

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#### *Lead Architect / Developer – Healthcare Organization*

Captured, analyzed and implemented business rules for healthcare application designed to improve performance of J2EE-based pharmacy system. Led cross-functional team through system enhancements from the requirements gathering and synthesis through the application development, quality assurance and customer acceptance testing.

Implemented various regulatory, system usability and performance changes which contributed to product maintenance, scalability and execution. Coordinated integration of core solution with open source rules engine, and contributed to migration of legacy business rules to the modernized rules engine platform.

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**Technologies and skills**

FICO Blaze Advisor 6/7	JBoss Drools	Java	J2EE	Greenplum
Oracle	Weblogic	JSP	.NET	SAP R/3
Data Warehousing	Agile Methodologies	Mobile Applications	Healthcare IT	SOA

EXHIBIT A

WRITTEN ASSURANCE OF COMPLIANCE WITH PROTECTIVE  
ORDER FOR DISCLOSURE OF CONFIDENTIAL INFORMATION

Brian J. Sacco declares that:

(1) I reside at 8903 N. Newcastle Ln  
in the city of Hayden, county of Kootenai,  
state of IDAHO.

(2) I am currently employed by Tech Blue Inc. located  
at 322 North Shore Drive, Pittsburgh, PA 15212.

My current job title is TECHNICAL DIRECTOR.

(3) I have read and believe I understand the terms of the Protective Order filed in Case No. 16-cv-1054 (WMW/TNL), pending in the United States District Court for the District of Minnesota. I agree to comply with and be bound by the provisions of the Protective Order. I understand that any violation of the Protective Order may subject me to sanctions by the Court.

(4) I understand that I am to retain all documents or other Information or Discovery Materials designated as "Confidential" that I receive pursuant to the Protective Order, and all copies, notes, summaries, recordings, or other reproductions thereof made by me, for me, or at my direction, in a safe and secure place and allow limited access thereto consistent with the Protective Order.

(5) I will not divulge any designated "Confidential" Information or Discovery Materials, copies thereof, or the contents of such Information or Discovery Materials that

I receive pursuant to the Protective Order to any person other than those specifically authorized by the Protective Order. I shall not copy or use such Information or Discovery Materials except for the purposes of this Action and pursuant to the terms of the Protective Order.

(6) I understand that I am not permitted to receive, review, inspect, or retain any Information or Discovery Materials designated as "Confidential – Attorneys' Eyes Only." If I find that I have been given access to such Information or Discovery Materials, I agree not to review such Information or Discovery Materials, to keep them confidential, and to immediately notify the Attorney from whom I received them.

(7) As soon as practical, but no later than thirty (30) days after final termination of this Action, I shall return to the Attorney from whom I have received them, any Information or Discovery Materials in my possession designated "Confidential" and all copies, excerpts, summaries, notes, digests, abstracts, and indices relating to such Information and Discovery Materials.

(8) I submit myself to the jurisdiction of the United States District Court for the District of Minnesota for purposes relating to the Protective Order, including any enforcement taken pursuant to the Protective Order.

(9) I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 1/16/20

  
(Signature)

**EXHIBIT B**

**WRITTEN ASSURANCE OF COMPLIANCE WITH  
PROTECTIVE ORDER FOR DISCLOSURE OF  
CONFIDENTIAL – ATTORNEYS' EYES ONLY INFORMATION**

Brian J. Sacco declares that:

(1) I reside at 8903 N Newcastle Ln  
in the city of Hayden, county of Kootenai,  
state of Idaho.

(2) I am currently employed by TECH BLUE, Inc. located  
at 322 North Shore Drive, Pittsburgh, PA, 15212.  
My current job title is Technical Director.

(3) I have read and believe I understand the terms of the Protective Order filed in Case No. 16-cv-1054 (WMW/TNL), pending in the United States District Court for the District of Minnesota. I agree to comply with and be bound by the provisions of the Protective Order. I understand that any violation of the Protective Order may subject me to sanctions by the Court.

(4) I understand that I am to retain all documents or other Information or Discovery Materials designated as "Confidential" or "Confidential – Attorneys' Eyes Only" that I receive pursuant to the Protective Order, and all copies, notes, summaries, recordings, or other reproductions thereof made by me, for me, or at my direction, in a safe and secure place and allow limited access thereto consistent with the Protective Order.



(5) I will not divulge any designated “Confidential” or “Confidential – Attorneys’ Eyes Only” Information or Discovery Materials, copies thereof, or the contents of such Information or Discovery Materials that I receive pursuant to the Protective Order to any person other than those specifically authorized by the Protective Order. I shall not copy or use such Information or Discovery Materials except for the purposes of this Action and pursuant to the terms of the Protective Order.

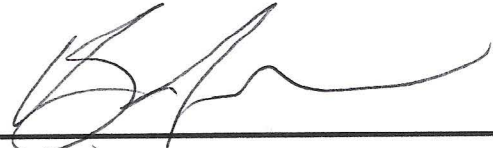
(6) As soon as practical, but no later than (thirty) 30 days after final termination of this Action, I shall return to the attorney from whom I have received them, any Information or Discovery Materials in my possession designated “Confidential” or “Confidential – Attorneys’ Eyes Only” and all copies, excerpts, summaries, notes, digests, abstracts, and indices relating to such Information and Discovery Materials.

(7) I submit myself to the jurisdiction of the United States District Court for the District of Minnesota for purposes relating to the Protective Order, including any enforcement taken pursuant to the Protective Order.

(8) I declare under penalty of perjury that the foregoing is true and correct.

Executed on: \_\_\_\_\_

1/16/20

  
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(Signature)